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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

<b>SUSAN SABOL, VALERIE DONE, and KATHLEEN KLODNER, on behalf of themselves and all others similarly situated,</b>	<b>CIVIL ACTION NO. 2:11-cv-04586-SRC-MAS</b>
<p>Plaintiffs,  -against-  <b>HYDROXATONE, LLC and ATLANTIC COAST MEDIA GROUP</b> Defendants.</p>	<b>STIPULATION TO FILE SECOND AMENDED COMPLAINT</b>

IT IS HEREBY STIPULATED AND AGREED upon by and between Kelley Drye and Warren LLP, attorneys for defendants Hydroxatone, LLC and Atlantic Coast Media Group (collectively “Defendants”), and Cohen Milstein Sellers & Toll PPLC, attorneys for plaintiffs, Susan Sabol, Valerie Done and Kathleen Kladner (collectively “Plaintiffs”), that, pursuant to Fed. R. Civ. P. 15(a)(2), Defendants consent to Plaintiffs filing the Second Amended Complaint, attached hereto as Exhibit A, on February 7, 2013.

McLaughlin & Stern LLP  
Attorneys for Plaintiffs

By: /s/ Alan E. Sash  
Alan E. Sash

Dated: February 7, 2013

Kelley Drye and Warren LLP  
Attorneys for Defendants

By: /s/ Lauri Mazzuchetti  
Lauri Mazuchetti

Dated: February 7, 2013

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**SO ORDERED**

*s/Kevin McNulty*  
Kevin McNulty, U.S.D.J.

Date: *2/8/13*